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August 19, 2002

Ms Marlene H. Dortch
Secretary
Federal Communications Commission
The Portals
445 12th Street, S.W.
Washington, D.C. 20554

Re: WC Docket No. 02-150

Dear Ms Dortch:

This is to inform you that on August 19, 2002, Margaret Greene, Ernest Bush, Jon Banks, Glenn Reynolds and I met with William Maher, Chief of the Wireline Competition Bureau, and members of his staff to discuss issues related to BellSouth's change management performance. Bureau staff participating in the meeting included: Jeffrey Carlisle; Scott Bergmann; Michelle Carey; Tamara Preiss; Richard Lerner; and Aaron Goldberger. The attached document formed the basis for our presentation.

In accordance with Section 1.1206, I am filing two copies of this letter and the attachment and request that you place both in the record of the proceeding identified above. Thank you.

Sincerely,



Kathleen B. Levitz

Attachment

cc: William Maher
Jeffrey Carlisle
Richard Lerner
Scott Bergmann
Michelle Carey
Tamara Preiss
Aaron Goldberger
Susan Pié
James Davis-Smith

BellSouth's Change Control Process

- BellSouth has continued to strengthen its CCP since the approval of the Georgia/Louisiana Application. Improvements have been made in:
 - Implementation of high priority CLEC features.
 - Prioritization and resource allocation.
 - Discovering, minimizing and correcting software defects.
 - Change Control Process itself.
- BellSouth commits significant resources to CCP.
 - 2002: 300,000 programmer hours and \$108M.
 - 2003: Comparable to 2002.
 - Contractors: Telcordia and Accenture

BellSouth's Change Control Process

- Implementation of high priority CLEC features.
 - Fully parsed CSR
 - Single C ordering
 - Mechanized ordering for line splitting, UDC, EELs
 - Process improvements such ability to create new listings in LENS, view multiple CSRs simultaneously, get connecting facility assignment information via pre-order query, etc.
- On track to implement “top 15” requests by year end.
 - Mechanized ordering for partial migrations of UNE loops.
 - Support for UNE to UNE bulk migration.
 - Electronic reject for invalid record change orders.
 - Etc.
- In addition to “top 15”, BellSouth will implement 25 other change requests in 2002.

BellSouth's Change Control Process

- Prioritization and resource allocation
 - BellSouth is implementing OSS changes as quickly as possible given change control process and software engineering constraints.
 - CCP mandates lead times for each step in software development process; e.g. provision of user requirements, development of system requirements, coding and testing.
 - Effect is to limit number of releases in a given year.
 - Practical limitation on number of releases that can be in development simultaneously.
 - Claims of a substantial “backlog” of change requests are inflated. Features are being staged as required by the CCP.
 - BellSouth has now implemented the “50/50 allocation and prioritization process” as ordered by the Florida PSC.

BellSouth's Change Control Process

New Requests		22
<i>Rejected, not cancelled</i>	13	
<i>Under investigation, pending clarification</i>	5	
<i>Documentation/process</i>	2	
<i>Response due within 10 business days</i>	2	
Pending (all documentation/process)		3
Candidates for assignment to release		27
<i>Slotted for Release 12.0</i>	2	
<i>BellSouth Change Requests</i>	8	
<i>CLEC Change Requests</i>	17	
Scheduled		5
<i>Documentation/process</i>	1	
<i>Release 10.6</i>	2	
<i>Release 11.0</i>	2	

BellSouth's Change Control Process

- Software Defects
 - Much attention has been focused on software defects in BellSouth's Release 10.5. Indeed, BellSouth was disappointed in having to report 35 CLEC affecting defects. But...
 - 30 of the 35 defects each affected between 1 and 10 CLEC orders.
 - Most were generated on orders that were in process as conversion to Release 10.5 was made. Unique and limited circumstance.
 - Remaining 5 defects were corrected within days of implementation.
 - By objective measure (defects per function point) BellSouth's software quality is very good and improving.
 - » Release 10.3: .00708 defects/function point
 - » Release 10.5: .00467 defects/function point
 - QP Management Group evaluation.
 - BellSouth is taking additional steps to improve release quality.
 - Defect correction takes minimal CCP resource.

BellSouth's Change Control Process

- Process Improvement
 - Implementation of “50/50” plan pursuant to order of the Florida PSC.
 - Region-wide, voluntary implementation of CCP measures and penalties adopted by the Florida PSC
 - Time to fix software defects.
 - Percent of Change Requests accepted or rejected within 10 days.
 - Percent of Change Requests rejected.
 - Number of software defects in production releases.
 - Software validation.
 - Percent of Change Requests implemented within 60 weeks.
 - Adherence to process requirements.